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Premera Blue Cross of Alaska

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

OASIS TARZANA, LLC, a California
Limited Liability Company,

Plaintiff,

v.

PREMERA BLUE CROSS OF
ALASKA; and DOES 1-50; and DOES
1 through 50, inclusive

Defendants.

PREMERA BLUE CROSS,

Counter-Complainant,

v.

OASIS TARZANA, LLC, a California
Limited Liability Company, and DOES
1-50, inclusive,

Counter-Defendants.

Case No. 2:24-cv-5847-SVW-AS

**DECLARATION OF GABRIEL R.
ULMAN IN SUPPORT OF
COUNTER-PLAINTIFF
PREMERA BLUE CROSS'S
MOTION FOR ATTORNEY FEES**

Honorable Stephen V. Wilson

DECLARATION OF GABRIEL R. ULMAN

I, Gabriel R. Ulman, hereby declare as follows:

1. I am a member in good standing of the California bar and admitted to practice before the United States District Court for the Central District of California. I have been practicing law for over nine years, and I am Counsel at the law firm of Robins Kaplan LLP, and one of the lawyers representing Defendant and Counter-Plaintiff Premera Blue Cross of Alaska (“Premera”) in this action. I have personal knowledge of the facts stated in the declaration and would, if called as a witness, competently testify to those facts.

2. My colleague, Jessica Pettit, also represents Premera. Ms. Pettit is also Counsel at Robins Kaplan LLP, and she has been practicing for over ten years.

3. On November 6, 2024, the Court issued the Order Imposing Sanctions, in which it ordered Isaac Dillon, former counsel for Plaintiff and Counter-Defendant Oasis Tarzana LLC (“Oasis”) to pay to Premera the “reasonable expenses incurred by [Premera] in preparing for and attending the two status conferences at which Mr. Dillon failed to make an appearance,” which were the August 26, 2024 and September 9, 2024 status conferences. ECF No. 33.

4. The Court further noted that Mr. Dillon should pay Premera’s related attorneys’ fees, “including any costs incurred by any counsel for [Premera] in connection with the status conferences, such as preparation time, travel time, and time billed for making the appearance itself.” ECF No. 33.

5. Because Ms. Pettit was out of the country, I flew out to Los Angeles from Minneapolis for the September 9, 2024 status conference.

6. Attached as Exhibit A is a billing summary of Ms. Pettit’s and my total fees and costs associated with the two status conferences. Ms. Pettit and I worked a total number of 8.2 hours with a corresponding total amount of fees of \$4,715.00.

7. The fees listed in Exhibit A were prepared from contemporaneous, daily time records regularly prepared and maintained by my firm. The hourly rates

1 provided for Ms. Pettit and I are the same as our usual and customary hourly rates
2 charged in similar civil litigation matters.

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4 I declare under penalty of perjury under the laws of the United States of
5 America that the foregoing is true and correct.

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8 Executed this 22nd day of November, 2024, in Hennepin County, Minnesota.

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10 /s/ Gabriel Ulman

11 Gabriel R. Ulman
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ROBINS KAPLAN LLP
ATTORNEYS AT LAW
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EXHIBIT A

Gabriel Ulman

Work	Date	Hours	Total Fees/Costs
Meet and confer with Isaac Dillon	August 19, 2024	1.2	\$690.00
Prepare for August 26 Status Conference	August 19 and August 23, 2024	1.5	\$862.50
Prepare for September 9 Status Conference	September 8, 2024	1	\$575.00
Attend September 9 status conference	September 9, 2024	0.5	\$287.50
		Total: 4.2	\$2,415.00

Jessica Pettit

Work	Date	Hours	Total Fees/Costs
Meet and confer with Isaac Dillon	August 19, 2024	1.2	\$690.00
Prepare for August 26 Status Conference	August 19 and August 23, 2024	1.2	\$690.00
Attend August 26 status conference	September 9, 2024	1.6	\$920.00
		Total: 4.0	\$2,300.00